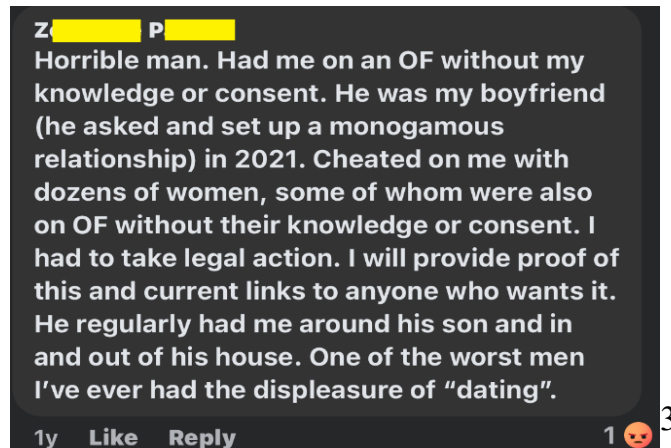
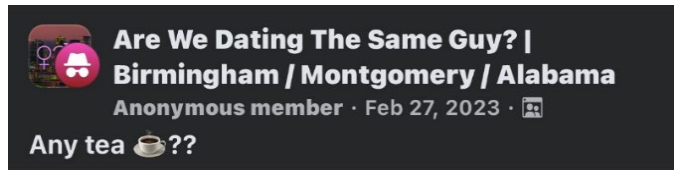


Case No.: 7:24-CV-00151-ACA

² The two did go out to eat once.

3. After making the videos, Z.P. posted the videos on her own FetLife profile.
4. Z.P. also consented to Defendant/Counter-Plaintiff posting the videos on his FetLife page where he also “tagged” Z.P., which notified Z.P. and posted it on her own page. Z.P. subsequently “liked” the post and consented.
5. All intimate posted content relative to Z.P. was removed from Defendant/Counter-Plaintiff’s posted content upon the termination of the relationship in approximately September of 2021.
6. When Z.P. discovered that Defendant/Counter-Plaintiff was also having sex with another individual, Z.P. became angry and, for all that appears, this is where the malicious campaign aimed at destroying Defendant/Counter-Plaintiff’s reputation began. Z.P. decided to find a way to make him pay.
7. Z.P. wanted Defendant/Counter-Plaintiff to be punished for his perceived “infidelity”; thus, Z.P. concocted a revenge scheme and began disseminating false allegations about Defendant/Counter-Plaintiff publicly.
8. Z.P. informed countless individuals that Defendant/Counter-Plaintiff was abusive, that Defendant/Counter-Plaintiff committed sex crimes, committed felonious crimes, is a sex addict, and indicated he would be arrested for “multiple felonies,” among other false accusations.



9. Z.P., working in concert with other third parties and Plaintiff/Counter-Defendants, began harassing and stalking Defendant/Counter-Plaintiff as well as Defendant/Counter-Plaintiff's friends and family members—maliciously invading Defendant/Counter-Plaintiff's privacy.
10. After Z.P. studied Defendant/Counter-Plaintiff's every move and social media post, she began harassing his social media friends and berating them if they did not join in her scheme to defame Defendant/Counter-Plaintiff.
11. Z.P., acting in concert with one or more of the Plaintiffs/Counter-Defendants, sent messages to third parties stating:

I hate that man so f***ing bad ... Like what a loser ... he's just dragging out the inevitable and making himself look like

³ Posted in the Facebook Group, *Are We Dating The Same Guy?| Birmingham/Montgomery/Alabama*, **along with his name and photograph.** <https://www.facebook.com/groups/1162533747874549/permalink/1329123184548937>

an a** in the process. And making me more angry. Which never works. Lol

* * *

I want him put away and I want people like her to feel bad about this.

* * *

...as long as it's over with him in jail or permanently learning his lesson I'll be satisfied....

* * *
* * *

Sucks when you're not only cheated on but also assaulted and on the internet for everyone to click and pay for. ...

* * *

I truly deeply wish you hell, I wish you choking pain and the realization that save your son, your life is empty and meaningless, and its so sad because your son deserves so much better than you. No amount of love or toys could ever usurp your evil and the inherently, shitty f***in person...

* * *

Your OnlyFans f***ing sucks and idk how you make your d**k look big like that. You are weak and frail minded, you're a pseudo intellectual and extremely stupid. Your face is rat like. And your tattoos are f***ing gay.

* * *

...he's also able to pass 'the vibe check' in the kink community (how we met, BDSM safety groups and stuff). He is INCREDIBLY sexually and emotionally abusive and a pathological liar.

* * *

... he is for a fact getting arrested. And multiple felony charges ...By the way of evidence confirmed ...multiple felony charges...more than half a dozen charges.

* * *

It would be several felonies already.

The third party questioned the information with:

I always just assumed everyone he posted was for it. Cause I was absolutely not blind of him having sites.

12. Z.P., acting in concert with one or more of the Plaintiffs/Counter-Defendants, sent messages to third parties to induce them to join the lawsuit stating that the civil lawsuit will provide:

...more direct reparations. It will mainly be financial, at least at first.

13. Since filing the instant lawsuit, Z.P. has deleted content relevant to this case, including the posted videos/pictures of herself having sex with Defendant/Counter-Plaintiff as well as many defamatory statements made publicly about Defendant/Counter-Plaintiff.
14. As a result of Z.P.'s actions and collusion with Plaintiffs/Counter-Defendants and other third parties, Defendant/Counter-Plaintiff has been exposed to public ridicule and contempt and has suffered, and continues to suffer, immense emotional distress, all of which will extend into the future.
15. Z.P.'s misconduct stated herein has significantly disrupted Defendant/Counter-Plaintiff's daily life, negatively interfered with his personal relationships with his friends and family, and has altered his social interactions significantly. As a result, he became socially withdrawn, stopped attending family gatherings, and did not

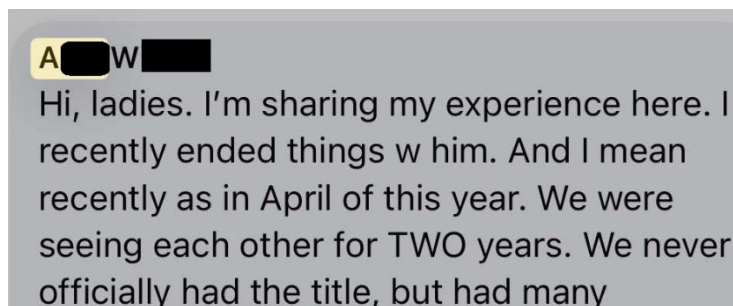
leave home for days at a time. He has crying spells, has often sleepless nights, and his work performance and concentration suffers significantly.

16. Defendant/Counter-Plaintiff has since severed ties with multiple close friends and family members and has not been able to resume normal social interaction. He suffered from, and/or continues to suffer from, the following: ongoing depression, anxiety, PTSD, insomnia, migraines, headaches, digestive upset, extreme fear for his safety, well-being, and livelihood, loss of appetite and weight loss, fatigue, panic attacks, weekly, and many times daily, uncontrollable sobbing, chest pains, memory fog, and inability to concentrate.

Facts Specific to A.W.

17. A.W. met Defendant/Counter-Plaintiff on a dating website in approximately 2021.
18. Defendant/Counter-Plaintiff began having sex with A.W. in 2021 while continuing to have sex with Z.P.
19. Defendant/Counter-Plaintiff and A.W. entered what A.W. referred to as a sexual “situationship,” with no drama or expectation of exclusivity.
20. A.W. and Defendant/Counter-Plaintiff also recorded intimate videos, which both parties consented to being posted.
21. A.W. was always present when Defendant/Counter-Plaintiff posted the videos on social media but requested her face not be shown in published videos.
22. In April 2023, A.W. expressed her desire to take the relationship to another level and Defendant/Counter-Plaintiff declined.

23. While still in a sex-only relationship with A.W., Defendant/Counter-Plaintiff continued having sex with Z.P.
24. A.W. found out there was another individual with whom Defendant/Counter-Plaintiff was having sex and became angry. A.W. wanted to make Defendant/Counter-Plaintiff pay and plotted to take revenge.
25. Z.P. contacted A.W. and attempted to get A.W. to join in her scheme to defame, harass, and punish Defendant/Counter-Plaintiff. A.W. agreed and the two formed a plan. A.W. also knowingly and maliciously encouraged the other Plaintiffs/Counter-Defendants throughout their scheme to defame using false allegations about Defendant/Counter-Plaintiff to prompt an investigation which, in turn, lead to search warrants⁴ which were issued later.



26. Since filing the instant lawsuit, A.W. has deleted content relevant to this case, including the posted videos/pictures of herself having sex with Defendant/Counter-Plaintiff as well as many defamatory statements made publicly about Defendant/Counter-Plaintiff.

⁴ Signed by the magistrate on June 21, 2023.

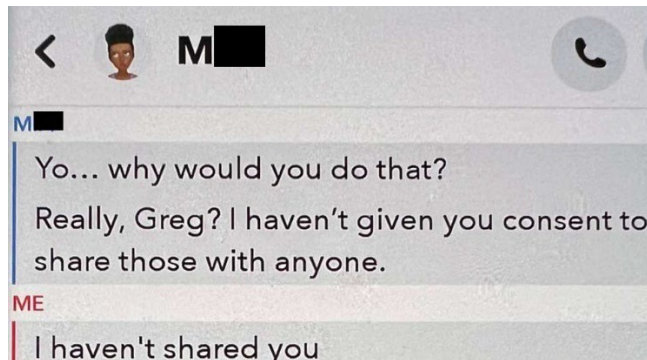
27. As a result of A.W.'s actions and collusion with Plaintiffs/Counter-Defendants and other third parties, Defendant/Counter-Plaintiff has been exposed to public ridicule and contempt and has suffered, and continues to suffer, immense emotional distress, all of which will extend into the future.
28. A.W.'s misconduct stated herein has significantly disrupted Defendant/Counter-Plaintiff's daily life, negatively interfered with his personal relationships with his friends and family, and has altered his social interactions significantly. As a result, he became socially withdrawn, stopped attending family gatherings, and did not leave home for days at a time. He has crying spells, has often sleepless nights, and his work performance and concentration suffers significantly.
29. Defendant/Counter-Plaintiff has since severed ties with multiple close friends and family members and has not been able to resume normal social interaction. He suffered from, and/or continues to suffer from, the following: ongoing depression, anxiety, PTSD, insomnia, migraines, headaches, digestive upset, extreme fear for his safety, well-being, and livelihood, loss of appetite and weight loss, fatigue, panic attacks, weekly, and many times daily, uncontrollable sobbing, chest pains, memory fog, and inability to concentrate.

Facts Specific to M.L.

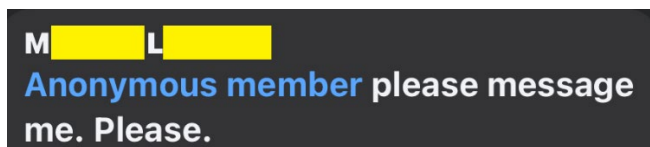
30. M.L. met Defendant/Counter-Plaintiff on Feeld⁵ in 2022 and began having sex with Defendant/Counter-Plaintiff. There were no involved commitments or expectations of exclusivity.
31. During the sexual relationship with Defendant/Counter-Plaintiff, M.L. also had sex with several other individuals.
32. M.L. recorded sexually explicit videos of herself and Defendant/Counter-Plaintiff on her phone and on Defendant/Counter-Plaintiff's phone. Defendant/Counter-Plaintiff also recorded videos.
33. Defendant/Counter-Plaintiff only shared videos with M.L. and did not distribute publicly.
34. M.L. and Defendant/Counter-Plaintiff's relationship ended respectfully when M.L. entered into a relationship with a new man in April 2023.
35. M.L.'s new man found her videos while going through her phone and, in an effort to confront her while preserving his betrayal of her trust by going through her phone, told M.L. that Defendant/Counter-Plaintiff sent him the videos.

⁵ According to the Feeld website, "Feeld is a dating app for the curious; those open to experiencing people and relationships in new ways. Polyamory, consensual non-monogamy, homo- and heteroflexibility, pansexuality, asexuality, aromanticism, voyeurism, and kink are just a few of the sexual identities and desires that make up the Feeld community." "Feeld's ever-evolving platform creates safer, more inclusive spaces online and IRL for everyone to express and explore gender, sexuality, and desire outside of existing blueprints." See, <https://feeld.co/about>.

36. Believing her boyfriend's lies, M.L. decided to make Defendant/Counter-Plaintiff pay for these false allegations about Defendant/Counter-Plaintiff.
37. Defendant/Counter-Plaintiff did not send any intimate videos of M.L. to M.L.'s boyfriend, of which M.L., without fact-checking, has publicly, falsely, and repeatedly accused him.



38. After seeing Z.P.'s defamatory comments on the Facebook Group, M.L. contacted Z.P. and Z.P. convinced her to conspire with her and the other Plaintiffs/Counter-Defendants in a scheme to defame, harass, and punish Defendant/Counter-Plaintiff. M.L. agreed and knowingly encouraged the other Plaintiffs/Counter-Defendants to do the same and invade Defendant/Counter-Plaintiff's privacy.



39. Since filing the instant lawsuit, M.L. has deleted content relevant to this case, including videos/pictures of herself having sex with Defendant/Counter-Plaintiff as well as many defamatory statements made publicly about Defendant/Counter-Plaintiff.

40. As a result of M.L.'s actions and collusion with Plaintiffs/Counter-Defendants and other third parties, Defendant/Counter-Plaintiff has been exposed to public ridicule and contempt and has suffered, and continues to suffer, immense emotional distress, all of which will extend into the future.
41. M.L.'s misconduct stated herein has significantly disrupted Defendant/Counter-Plaintiff's daily life, negatively interfered with his personal relationships with his friends and family, and has altered his social interactions significantly. As a result, he became socially withdrawn, stopped attending family gatherings, and did not leave home for days at a time. He has crying spells, has often sleepless nights, and his work performance and concentration suffers significantly.
42. Defendant/Counter-Plaintiff has since severed ties with multiple close friends and family members and has not been able to resume normal social interaction. He suffered from, and/or continues to suffer from, the following: ongoing depression, anxiety, PTSD, insomnia, migraines, headaches, digestive upset, extreme fear for his safety, well-being, and livelihood, loss of appetite and weight loss, fatigue, panic attacks, weekly, and many times daily, uncontrollable sobbing, chest pains, memory fog, and inability to concentrate.

Facts Specific to G.C.

43. G.C. and Defendant/Counter-Plaintiff met on FetLife in approximately October 2022 and began having sex. The relationship was not exclusive and included no commitment or expectations thereof. Notably, G.C. had several other relationships during this time—some of which involved multiple married men.

44. Explicit content of G.C. and Defendant/Counter-Plaintiff having sex was recorded on both parties' phones. G.C. posted this content to her own profile page and consented to the Defendant/Counter-Plaintiff posting the content on his profile. G.C. consented to and knew of being publicly "tagged" in all posted videos.
45. After seeing G.C. being tagged in the explicit videos on G.C.'s own profile, Z.P. contacted G.C. and convinced her to conspire with her and the other Plaintiffs/Counter-Defendant in a scheme to defame, harass, and punish Defendant/Counter-Plaintiff. G.C. agreed and knowingly encouraged the other Plaintiffs/Counter-Defendants to defame Defendant/Counter-Plaintiff and invade his privacy.
46. G.C., acting in concert with the other Plaintiffs/Counter-Defendants, sent text messages to third parties that included:

I wanna kill him!!!
47. Since filing the instant lawsuit, G.C. has deleted content relevant to this case, including the posted videos/pictures of herself having sex with Defendant/Counter-Plaintiff as well as many defamatory statements made publicly about Defendant/Counter-Plaintiff.
48. As a result of G.C.'s actions and collusion with Plaintiffs/Counter-Defendants and other third parties, Defendant/Counter-Plaintiff has been exposed to public ridicule and contempt and has suffered, and continues to suffer, immense emotional distress, all of which will extend into the future.

49. G.C.'s misconduct stated herein has significantly disrupted Defendant/Counter-Plaintiff's daily life, negatively interfered with his personal relationships with his friends and family, and has altered his social interactions significantly. As a result, he became socially withdrawn, stopped attending family gatherings, and did not leave home for days at a time. He has crying spells, has often sleepless nights, and his work performance and concentration suffers significantly.
50. Defendant/Counter-Plaintiff has since severed ties with multiple close friends and family members and has not been able to resume normal social interaction. He suffered from, and/or continues to suffer from, the following: ongoing depression, anxiety, PTSD, insomnia, migraines, headaches, digestive upset, extreme fear for his safety, well-being, and livelihood, loss of appetite and weight loss, fatigue, panic attacks, weekly, and many times daily, uncontrollable sobbing, chest pains, memory fog, and inability to concentrate.

Facts Specific to One or More Plaintiffs/Counter-Defendants

51. Since February 2023, Plaintiffs/Counter-Defendants, or another individual or individuals acting in concert with one or more of the Plaintiffs/Counter-Defendants, have continuously harassed and defamed Defendant/Counter-Plaintiff relentlessly and/or encouraged other Plaintiffs/Counter-Defendants and/or third parties to post and/or comment defamatory statements on various social media platforms and to countless members of the community and the state of Alabama.⁶

⁶ In fact, according to the Are We Dating The Same Guy? Website, "AWDTSG ... is a global safety support community for women, with over **6 million members across 200+**

52. As a part of their scheme, Plaintiffs/Counter-Defendants, or another individual or individuals acting in concert with one or more of the Plaintiffs/Counter-Defendants, falsely and maliciously reported to Tuscaloosa Police Department that Defendant/Counter-Plaintiff publicly distributed intimate videos with them without their consent, knowing these allegations were false. The scheme was designed to prompt an investigation via TPD but also to obtain evidence from the investigation and warrants issued therein to use in the federal case they planned to file for monetary gain.
53. Thereafter, TPD issued several warrants⁷ to various social media platforms regarding the related videos which were thereafter provided to TPD in response.
54. *After* the issuance of the TPD warrants, Plaintiffs/Counter-Defendants, acting in concert with one another, recklessly, negligently, willfully, maliciously, and wantonly disseminated false statements about the investigation and about Defendant/Counter-Plaintiff to countless third parties to damage his reputation.
55. *After* the issuance of the TPD warrants, one or more of the Plaintiffs/Counter-Defendants, acting in concert with one another, maliciously made, or caused to be made, *anonymous* and severely defamatory posts and comments about Defendant/Counter-Plaintiff in the Facebook group and/or encouraged other

cities ... across the USA, Canada, and ... over 7 million women worldwide.”
<https://arewedatingthesameguy.com/resources/>.

⁷ Signed by the magistrate in June 2023.

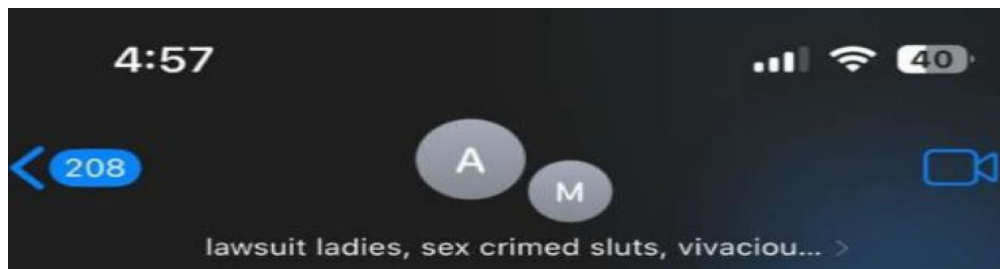
Plaintiffs/Counter-Defendants and/or third parties to post and/or comment defamatory statements.

56. After TPD consulted the District Attorney's office, TPD determined that no charges could be brought because, **"They were *not clearly identifiable* in the video[s], nor were their names used on the websites that hosted the con[t]ent Since the women in the videos are *not clearly identifiable*, charges cannot be brought against Bryant for distribution of a private image."** (emphasis added). In fact, Plaintiffs/Counter-Defendants even misidentified themselves.
57. In June 2023, Defendant/Counter-Plaintiff was made aware that intimate videos on his social media profiles had been hacked or "ripped" and reposted on other sites. Thereafter, Defendant/Counter-Plaintiff paid for and filed a "DMCA (Copyright) Complaint to Google" using a service by Rulta⁸ in order to have all hacked videos removed.
58. Plaintiffs/Counter-Defendants were aware that Defendant/Counter-Plaintiff was hacked, and they were also aware of the filing of the DMCA complaint relative to the videos of themselves having sex with Defendant/Counter-Plaintiff. However, this knowledge did not stop Plaintiffs/Counter-Defendants from recklessly, negligently, willfully, maliciously, and wantonly carrying out their plan to destroy

⁸ According to their website, "Rulta finds and eliminates content leaks, specializing in content protection. We safeguard your digital assets against unauthorized distribution." See, www.rulta.com.

Defendant/Counter-Plaintiff's reputation, cause TPD to issue warrants, or file the instant lawsuit using the results of the warrants.

59. Plaintiffs/Counter-Defendants even concocted a text message group to effectuate the scheme regarding Defendant/Counter-Plaintiff, which they chose to name "lawsuit ladies, sex crimed sluts...".

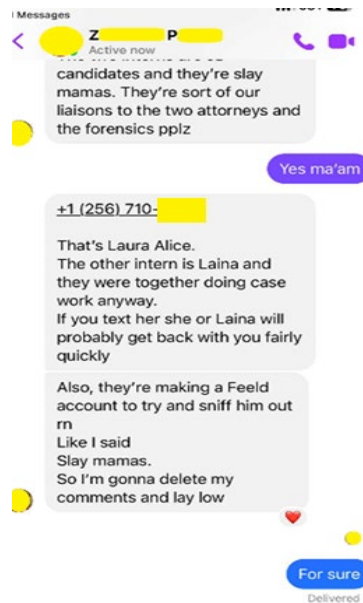


60. Plaintiffs/Counter-Defendants are members of a Facebook group⁹ called "Are We Dating the Same Guy?" ("the Facebook group"). The Facebook group provides the ability to post and comment *completely* anonymously. In its "About" section the Facebook group provides the following, "Feel free to post anonymously if the option is available for your account. **We will never reveal anyone's identity to anyone when something is posted anonymously.**" (emphasis added). Once a post is made anonymously, the poster remains anonymous throughout that post in comments and responses to comments.
61. *After* the TPD warrants were issued, one or more of the Plaintiffs/Counter-Defendants, or another individual or individuals acting in concert with one or more of the Plaintiffs/Counter-Defendants, made fake or "burner" accounts in order to

⁹ Are We Dating The Same Guy? | Birmingham / Montgomery / Alabama, *About*, Facebook, <https://www.facebook.com/groups/1162533747874549/?mibextid=oMANbw>.

either post or comment anonymously while simultaneously using another account, legitimate or fake, to comment as a non-anonymous individual on the anonymous post, thereby further insulating their identity.

62. *After* the TPD warrants were issued, one or more of the Plaintiffs/Counter-Defendants, or another individual or individuals acting in concert with one or more of the Plaintiffs/Counter-Defendants, made fake or “burner” accounts using the screennames “abuseadvocate,” “you didnt205,” “testdrive205,” “bunnybot,” “gigi_24,” and/or “jasminerosel5” in order to “sniff [Defendant/Counter-Plaintiff] out,” harass his friends and family, and make false statements about him publicly. They even messaged that their own counsel assisted them in their efforts.



63. *After* the TPD warrants were issued, one or more of the Plaintiffs/Counter-Defendants, or another individual or individuals acting in concert with one or more of the Plaintiffs/Counter-Defendants, made fake or “burner” accounts to post or message the following about Defendant/Counter-Plaintiffs, to reference a few:

testdrive205 26M Switch

He is unfortunately a classic abuser and narcissist, pathological liar. It really sucks.

Abuseadvocate 21 Head of Household 1h

You may ask him, but he will not tell the truth. He will put it off on a bitter ex. Want more proof? Just join the Facebook group and seek the hundreds of comments and dozens of other women confirming his activity. This man is a sick individual and it goes beyond illegal recording and posting.

warning

you didnt205 29NB Switch 23h

Hey there, I am so sorry to approach you like this, I am using my burner. I'm happy to message you on my old, main account, too, but, someone who recognized you told me to reach out. There is a man who used to be on FetLife, now active on Reddit, BlacktoWhite etc, currently the subject of a criminal investigation and federal felony nonconsensual porn lawsuit.

ladybunny0515 35F babygirl 40m

I'm not sure why you are sending things like this about people from their friends list. You have absolutely not idea if I have had any communication with him at all. You also are slandering someone's name which is a federal offense. Unless there are court documents that can be shown mind your own business. You could very well be a bitter ex or someone who was rejected. Show court documents or fuck off.

Abuseadvocate 21 Head of Household 35m

This is my business girly and I have all the proof and documents I need. I will just let the community know you're an ally of his. How dare you defend this sicko? But anyway you're likely another mindfucked female that's listening to his sweet lies. God bless you. Have a great day!



Anonymous member

Author

He is a rapist. DO NOT DATE HIM. Do not befriend him.

The DA has declined to prosecute as of today, but that does not mean what he has done isn't criminal.

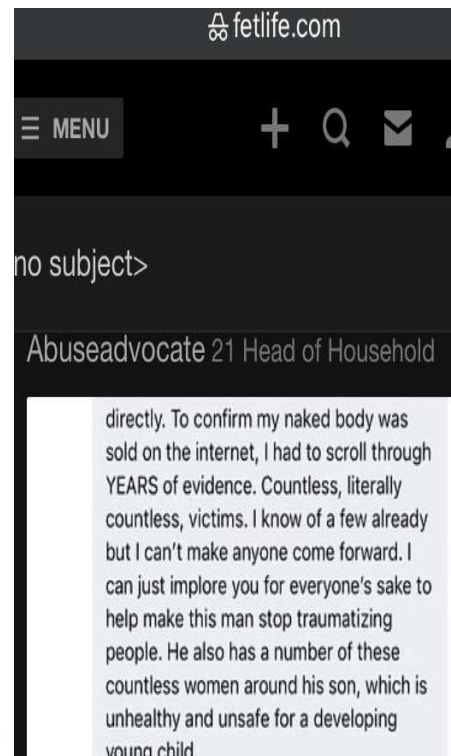
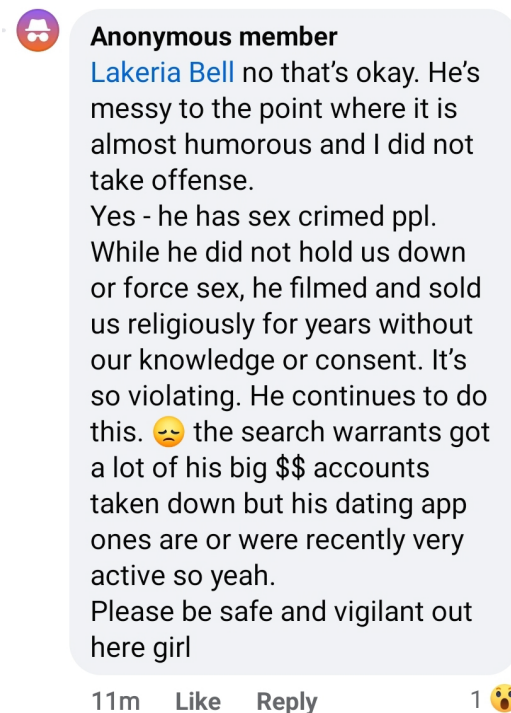
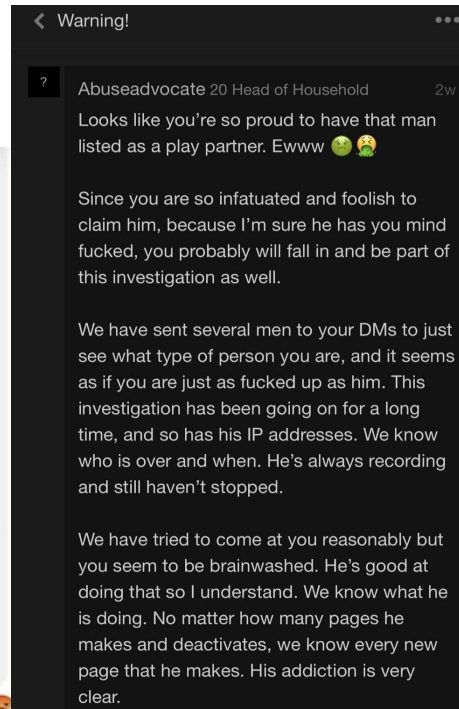
He sex crimed countless women. He filmed and then sold their bodies on social media websites like OnlyFans, Reddit, etc without their knowledge or consent.

Many women found themselves in evidence, but because their face wasn't showing, "no face, no case".

IF YOU ARE IN COMMUNITY WITH THIS MAN, HOLD HIM ACCOUNTABLE.

7h Like Reply

48 🤔 😱 🤔



Abuseadvocate 21 Head of Household 7h

You know, I was going to leave you alone and let you stay delusional like you were in our previous messages. Here are your court documents and whatnot and some more information for you. The way you defended that disgusting individual, especially after reading your profile, is quite comical and I know you didn't know any better. You defended the most drama ridden perv in



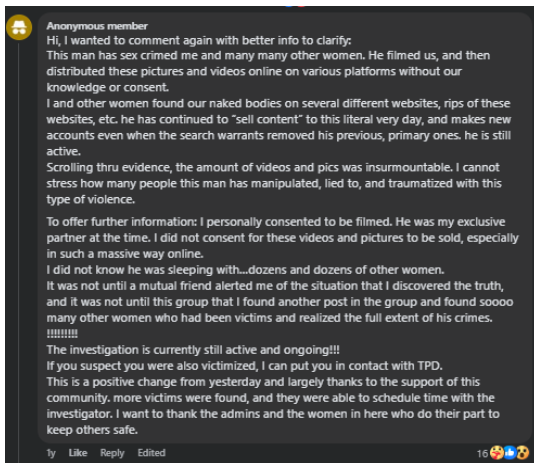
64. As planned, and now with the knowledge and assistance of counsel, after filing the instant lawsuit for monetary gain and liquidated damages provided under 15 U.S.C.

§6851, Plaintiffs/Counter-Defendants filed a subpoena for the investigative materials relative to the investigation of Defendant/Counter-Plaintiff in order to bolster their false allegations.

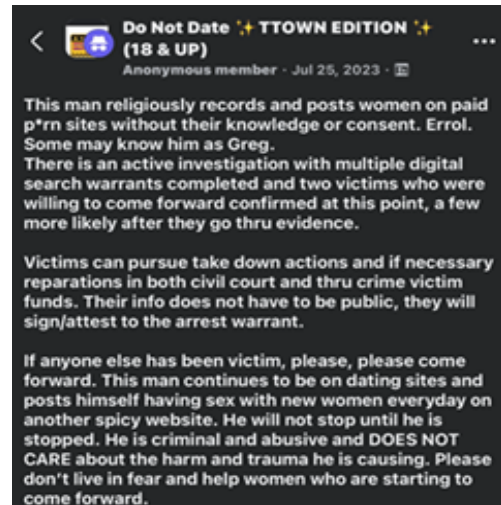
65. *After* the TPD warrants were issued and also after the filing of the instant lawsuit, Plaintiffs/Counter-Defendants, or another individual or individuals acting in concert with one or more of the Plaintiffs/Counter-Defendants, intentionally deleted the related messages, texts, videos, posts, pictures, and/or comments in order to obfuscate justice and prevent Defendant/Counter-Plaintiff from presenting the deleted items to form an adequate and truthful defense.
66. *After* the filing of the instant lawsuit, Plaintiffs/Counter-Defendants, acting in concert with one another, knowingly, recklessly, negligently, willfully, maliciously, and wantonly disseminated false statements about the investigation, the lawsuit, and about Defendant/Counter-Plaintiff, and/or caused and/or encouraged such statements be made on their behalf or at their direction, to third parties with intent to damage his reputation.

For example,





10



11

67. Plaintiffs/Counter-Defendants, acting in concert with one another, have collectively and separately, as a part of their scheme, recklessly, negligently, willfully, maliciously, and wantonly informed and/or encouraged other Plaintiffs/Counter-Defendants to inform countless individuals that Defendant/Counter-Plaintiff was abusive; that Defendant/Counter-Plaintiff committed sex crimes; that he committed felonious crimes, is a sex addict, has STDs or STIs, and would be arrested, when in fact no arrests or charges were ever made—and with the knowledge such information was false.

¹⁰ Posted in the Facebook Group, *Are We Dating The Same Guy?* | Birmingham/Montgomery/Alabama, along with his name and photograph. <https://www.facebook.com/groups/1162533747874549/permalink/1443956936398894>.

¹¹ Posted in the Facebook Group, *Do Not Date, TTown Edition*, along with his name and photograph.

<https://www.facebook.com/groups/749309543495534/permalink/846200797139741>;

see also,

<https://www.facebook.com/groups/1162533747874549/permalink/1329123184548937>

68. One or more of the Plaintiffs/Counter-Defendants, or another individual or individuals acting in concert with one or more of the Plaintiffs/Counter-Defendants, anonymously harassed third parties, in an effort to force them to join the TPD investigation and/or the instant lawsuit; however, when the third parties did not comply, one or more of the Plaintiffs/Counter-Defendants continued said anonymous harassment via social media. For example,

...you're proud to have that man listed as a play partner. Ewww. Since you are so infatuated and foolish to claim him, because I'm sure he has your mind f***ed, you probably will fall in and be part of this investigation as well. We have sent several men to your DMs to just see what type of person you are, and it seems you are just as f***ed up as him...

* * *

We know who is over and when.

* * *

We have tried to come at you reasonably but you seemed to be brainwashed.

* * *

I will **just let the community know** you're an ally of his. How dare you defend this sicko? But anyway you're likely another mind f***ed female that's listening to his sweet lies.

* * *

I was going to leave you alone and let you stay delusional. ... The way you defended that disgusting individual, especially after reading your profile, is quite comical and I know you didn't know any better. You defended the most drama ridden perv in town.

69. One or more of the Plaintiffs/Counter-Defendants, or another individual or individuals acting in concert with one or more of the Plaintiffs/Counter-Defendants, represented to third parties that Defendant/Counter-Plaintiff was abusive.

70. One or more of the Plaintiffs/Counter-Defendants, or another individual or individuals acting in concert with one or more of the Plaintiffs/Counter-Defendants, anonymously represented, or encouraged others to represent, the following to countless third parties about Defendant/Counter-Plaintiff:

His addiction is very clear.

* * *

Seriously, if you have ever hooked up with him ... reach out to the Tuscaloosa PD...

* * *

He also has countless women around his son, which is unhealthy and unsafe for a developing child.

* * *

He has a serious addiction and a problem.

* * *

He is a rapist. DO NOT DATE HIM. Do not befriend him. The DA has declined to prosecute as of today, but that does not mean what he has done isn't criminal.
IF YOU ARE IN COMMUNITY WITH THIS MAN, HOLD HIM ACCOUNTABLE.

* * *

He is a criminal and abusive.

* * *

Yes-he has sex crimed ppl.

* * *

He is unfortunately a classic abuser and narcissist, pathological liar.

* * *

This man is a sick individual and it goes beyond illegal recording and posting.

* * *

I'm sorry to approach you like this, I am using my burner. [Defendant/Counter-Plaintiff] has victimized countless women in Bham and Tuscaloosa areas.

Defendant/Counter-Plaintiff was never arrested or charged with any crime as a result of these allegations.

71. After the TPD warrants were issued, one or more of the Plaintiffs/Counter-Defendants, or another individual or individuals acting in concert with one or more of the Plaintiffs/Counter-Defendants, anonymously posted multiple times, and on multiple different social media platforms, Defendant/Counter-Plaintiff's photograph along with false and defamatory statements about Defendant/Counter-Plaintiff, with the intent to libel Defendant/Counter-Plaintiff.
72. With the filing of the instant lawsuit, and in addition to the malicious statements and false accusations, Defendant/Counter-Plaintiff is forced to relive the trauma of being falsely accused during the TPD investigation.
73. Defendant/Counter-Plaintiff has suffered, and continues to suffer, immense emotional distress as a result of Plaintiffs/Counter-Defendants' false and defamatory representations about him and exposed Defendant/Counter-Plaintiff to public ridicule and contempt, all of which will extend into the future.

74. Plaintiffs/Counter-Defendants' misconduct stated herein has significantly disrupted Defendant/Counter-Plaintiff's daily life, negatively interfered with his personal relationships with his friends and family, and has altered his social interactions significantly. As a result, he became socially withdrawn, stopped attending family gatherings, and did not leave home for days at a time. He has crying spells, has often sleepless nights, and his work performance and concentration suffers significantly.
75. Defendant/Counter-Plaintiff has since severed ties with multiple close friends and family members and has not been able to resume normal social interaction. He suffered from, and/or continues to suffer from, the following: ongoing depression, anxiety, PTSD, insomnia, migraines, headaches, digestive upset, extreme fear for his safety, well-being, and livelihood, loss of appetite and weight loss, fatigue, panic attacks, weekly, and many times daily, uncontrollable sobbing, chest pains, memory fog, and inability to concentrate.

COUNT I – LIBEL

76. Defendant/Counter-Plaintiff realleges and incorporates by reference all previous factual allegations.
77. Plaintiffs/Counter-Defendants, or another individual or individuals acting in concert with one or more of the Plaintiffs/Counter-Defendants, have willfully, maliciously, recklessly, negligently, and collectively made statements concerning Defendant/Counter-Plaintiff that are false and defamatory.
78. Plaintiffs/Counter-Defendants each published, or encouraged the publishing of, false and defamatory statements about Defendant/Counter-Plaintiff that constitute

libel *per se* under Alabama law, including false accusations of criminal conduct and sex crimes—such as rape and sexual assault—which are defamatory on their face and inherently damaging to Defendant/Counter-Plaintiff’s reputation. These false statements were knowingly published with actual malice, a reckless disregard for the truth, and without privilege.

79. These false statements include, but are not limited to:

False claims that Defendant/Counter-Plaintiff was being arrested and for felonious crimes and sex crimes, when in fact no arrests or charges were ever made;

False statements labeling Defendant/Counter-Plaintiff a “rapist” and claiming he “sex crimed people”;

False accusations of assault and abuse;

False claims about ongoing criminal investigations; and

That Defendant/Counter-Plaintiff is a sex addict and has STDs or STIs.

80. These defamatory statements were published in multiple forums, including: a Facebook group with over 45,000 members¹²; the website fetlife.com; and direct messages to numerous third parties.

81. The statements were demonstrably false, inasmuch as no arrests or charges were ever made against Defendant/Counter-Plaintiff despite Plaintiffs/Counter-Defendants’ claims.

¹² According to the *Are We Dating The Same Guy?* website, “AWDTSG ... is a global safety support community for women, with over **6 million members across 200+ cities** ... across the USA, Canada, and ... over 7 million women worldwide.” <https://arewedatingthesameguy.com/resources/>.

82. Defendant/Counter-Plaintiff has suffered damage to his reputation, emotional distress, and economic harm as a direct and proximate result of Plaintiffs/Counter-Defendants' false statements and representations about Defendant/Counter-Plaintiff.

COUNT II - ABUSE OF PROCESS

83. Defendant/Counter-Plaintiff realleges and incorporates by reference all previous factual allegations.
84. Plaintiffs/Counter-Defendants' improper purpose is demonstrated through a systematic pattern of malicious conduct evidenced by their own false statements and actions, including:
- a. Falsely reporting to TPD allegations that Defendant/Counter-Plaintiff distributed a private image without Plaintiffs/Counter-Defendants' consent in order to defame Defendant/Counter-Plaintiff, and cause warrants to be issued, the results of which they planned to use, and have used, in the instant lawsuit;
 - b. Falsely claiming Defendant/Counter-Plaintiff was an "abuser" and "abusive";
 - c. Explicitly stating their intent to obtain "direct reparations" that would be "mainly financial," demonstrating the use of legal process to extract monetary compensation for non-actionable personal grievances;
 - d. Deleting evidence which could be used by Defendant/Counter-Plaintiff in his defense of the instant lawsuit after filing the instant lawsuit, as well as deleting evidence which could be used by Defendant/Counter-Plaintiff in his defense of

- the TPD investigation, evidencing consciousness of wrongdoing and intent to destroy evidence;
- e. Expressing their desire to see Defendant/Counter-Plaintiff “put away” and to make others “feel bad about this,” showing intent to use the legal process for harassment and intimidation rather than legitimate purposes;
 - f. Using allegations of criminal conduct while simultaneously acknowledging no criminal charges were filed or pending, demonstrating their intent to use the legal system to create the appearance of wrongdoing where none existed.
85. Plaintiffs/Counter-Defendants used law enforcement warrants and the legal process as a weapon to accomplish purposes outside the legitimate scope of the process, including attempting to punish Defendant/Counter-Plaintiff for alleged infidelity and to extract financial compensation for non-actionable personal grievances.
86. As a direct and proximate result of Plaintiff/Counter-Defendants’ abuse of process, Defendant/Counter-Plaintiff has suffered damages, including legal fees and costs in defending against their improper claims; severe emotional distress from the public humiliation and harassment; loss of standing in his community and damage to his reputation.

**COUNT III - INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(OUTRAGE)**

87. Defendant/Counter-Plaintiff realleges and incorporates by reference all previous factual allegations.

88. Plaintiffs/Counter-Defendants knew or should have known that their collusion with each other and third parties to publicly defame Defendant/Counter-Plaintiff would cause Defendant/Counter-Plaintiff emotional distress.
89. Plaintiffs/Counter-Defendants knew or should have known that their collusion with each other and third parties to falsely report allegations about Defendant/Counter-Plaintiff to TPD would cause TPD to investigate and cause Defendant/Counter-Plaintiff emotional distress.
90. Plaintiffs/Counter-Defendants knew or should have known that their extremely defamatory statements made publicly to countless third parties across the internet and the public at large about Defendant/Counter-Plaintiff would cause Defendant/Counter-Plaintiff emotional distress.
91. Plaintiffs/Counter-Defendants conduct in colluding with each other and third parties to falsely report allegations to cause a TPD investigation, colluding with each other and third parties to publicly defame Defendant/Counter-Plaintiff, and making—and continuing to make—defamatory statements publicly to countless third parties across the internet and the public at large about Defendant/Counter-Plaintiff is extreme and outrageous.
92. Plaintiffs/Counter-Defendants’ extreme and outrageous conduct also includes: expressing desires for Defendant/Counter-Plaintiff’s death, stating “I wanna kill him!!!”; wishing “choking pain” upon Defendant/Counter-Plaintiff; conducting a coordinated campaign of harassment across multiple social media platforms; making deliberate attempts to destroy Defendant/Counter-Plaintiff’s personal

relationships; targeting communications to third parties with the explicit purpose of isolating Defendant/Counter-Plaintiff from his community.

93. Plaintiffs/Counter-Defendants conduct has caused Defendant/Counter-Plaintiff, and will continue to cause future, severe emotional distress.
94. Plaintiffs/Counter-Defendants' conduct was intentional and reckless.
95. Plaintiffs/Counter-Defendants' conduct was extreme and outrageous beyond all possible bounds of decency and utterly intolerable in a civilized society.
96. Plaintiffs/Counter-Defendants' actions caused Defendant/Counter-Plaintiff to suffer severe emotional distress including anxiety, damage to personal relationships, and fear for his reputation.
97. Defendant/Counter-Plaintiff is entitled to recover damages in an amount to be proven at trial.

COUNT IV - INVASION OF PRIVACY FALSE LIGHT

98. Defendant/Counter-Plaintiff realleges and incorporates by reference all previous factual allegations.
99. Plaintiffs/Counter-Defendants' intrusive conduct includes:
 - Publicly making detailed and defamatory posts about Defendant/Counter-Plaintiff's private life;
 - Publicly posting Defendant/Counter-Plaintiff's photograph and name in connection with defamatory and false statements about him;

Using multiple “burner” accounts to monitor Defendant/Counter-Plaintiff’s activities, stalking and harassing not only Defendant/Counter-Plaintiff but also his friends and family members;

Publishing false information about Defendant/Counter-Plaintiff’s personal relationships in public forums; and,

Engaging in a systematic campaign with each other and third parties to obtain private and intimate content from his social media by falsely reporting information to TPD about Defendant/Counter-Plaintiff.

100. In so doing, Plaintiffs/Counter-Defendants intentionally published false accusations to the public with actual malice and reckless disregard.

101. These false accusations constitute highly offensive conduct to a reasonable person.

102. As a direct and proximate result of Counter-Defendant’s invasion of privacy, Defendant/Counter-Plaintiff has suffered damages and is entitled to relief.

COUNT V - CIVIL CONSPIRACY

103. Defendant/Counter-Plaintiff realleges and incorporates by reference all previous factual allegations.

104. Plaintiffs/Counter-Defendants formulated a plan to act in concert with one another, to collectively and separately, as a part of their scheme, aid and abet the publication of defamatory statements about Defendant/Counter-Plaintiff, and are jointly and severally liable.

105. The agreement between Plaintiffs/Counter-Defendants included a plot to falsely accuse Defendant/Counter-Plaintiff of criminal allegations in order to cause an

investigation to commence and warrants to be issued in order to use in the manipulation of the instant lawsuit and for monetary gain.

106. Plaintiffs/Counter-Defendants' collusion is evidenced by Plaintiffs/Counter-Defendants' coordinated defamatory statements about Defendant/Counter-Plaintiff, their participation in or encouragement of false allegations to law enforcement to prompt an investigation, their use of that investigation to obtain evidence from warrants to file a civil lawsuit, their filing of the instant law suit and subsequent subpoena to TPD to obtain evidence for the instant lawsuit, and their deleting of content relevant to this case which would aid in Defendant/Counter-Plaintiff in his defense.

107. Plaintiffs/Counter-Defendants participated in a shared course of conduct to harm Defendant/Counter-Plaintiff through various social media platforms and communications with third parties, used multiple accounts and platforms to amplify their messages to cause harm to Defendant/Counter-Plaintiff, made public, detailed, and defamatory posts about Defendant/Counter-Plaintiff's private life, publicly posted Defendant/Counter-Plaintiff's photograph and name in connection with defamatory and false statements about him, used multiple "burner" accounts to monitor Defendant/Counter-Plaintiff's activities, stalking and harassing not only Defendant/Counter-Plaintiff but also his friends and family members, published false information about Defendant/Counter-Plaintiff's personal relationships in public forums; and, engaged in a systematic campaign with each other and third

parties to obtain private and intimate content from his social media by falsely reporting information to TPD about Defendant/Counter-Plaintiff.

108. Plaintiffs/Counter-Defendants and their co-conspirators had a meeting of the minds on the object and course of action.

109. In furtherance of this conspiracy, Plaintiffs/Counter-Defendants, or another individual or individuals acting in concert with one or more of the Plaintiffs/Counter-Defendants, committed overt acts including publishing false statements about Defendant/Counter-Plaintiff on social media platforms, sending defamatory messages to third parties, and initiating a TPD investigation and legal proceedings for improper purposes.

110. As a direct and proximate result of the conspiracy and actions taken in furtherance thereof, Defendant/Counter-Plaintiff has suffered damages as outlined above.

111. Defendant/Counter-Plaintiff reserves the right to amend this pleading upon identifying, through discovery, the individual Plaintiffs/Counter-Defendants responsible for the misconduct herein.

**DEFENDANT/COUNTER-PLAINTIFF REQUESTS A TRIAL BY STRUCK JURY
ON ALL ISSUES IN THIS CASE.**

WHEREFORE, PREMISES CONSIDERED, Defendant/Counter-Plaintiff demands judgment against each of the Plaintiffs/Counter-Defendants, jointly and severally, and seeks compensatory damages of not less than two-million dollars (\$2,000,000.00), or

in an amount, to be determined by a jury, to fairly and adequately compensate Defendant/Counter-Plaintiff.

Defendant/Counter-Plaintiff requests injunctive relief enjoining Plaintiffs/Counter-Defendants from making further defamatory statements, sanctions for spoliation of evidence, post-judgment interest, costs, and attorneys' fees as permitted by law, and such other and further relief as the Court deems just and adequate. Further, Defendant/Counter-Plaintiff requests that the jury selected to hear this case award punitive damages in an amount which will adequately reflect the enormity of Plaintiffs/Counter-Defendants' wrongful acts and which will prevent other similar wrongful acts.

Respectfully submitted,

/s/J. Thomas Burgess

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CERTIFICATE OF SERVICE

I certify that I served a copy of the foregoing on all attorneys of record, via the CM/ECF electronic filing system on May 27, 2025:

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